

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-20295-CR-BECERRA/TORRES

UNITED STATES OF AMERICA,

vs.

BRAYAN TOCHON-LOPEZ, et al,

Defendants.

_____ /

UNITED STATES' NOTICE OF SUPPLMENTAL AUTHORITY

COMES NOW the United States of America, by and through the undersigned Assistant United States Attorney, and files this Notice of Supplemental Authority and states as follow:

The Eleventh Circuit has now reiterated that “*Alfonso* did not break new ground” because the Circuit Court has repeatedly held that “because [a] vessel was beyond the ‘twelve-mile ... territorial boundary’ of [a nation’s] territorial waters, the vessel was ‘located within international waters’ and thus subject to MDLEA jurisdiction.” *See attached United States v. Canario-Vilomar*, 128 F.4th 1374, 1382 (11th Cir. 2025) (citing cases relying on the 12-mile limit of territorial waters).

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Based on the foregoing, the United States respectfully requests that the defendants' Motion to Dismiss be denied.

Respectfully submitted,

HAYDEN P. O'BYRNE
UNITED STATES ATTORNEY

/s/ Yvonne Rodriguez-Schack
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically filed on the 31st of March, 2025, with the Clerk of the Court using CM/ECF. I further certify that the foregoing document is being served this day on counsel of record via CM/ECF.

/s/ Yvonne Rodriguez-Schack
YVONNE RODRIGUEZ-SCHACK
Assistant United States Attorney